

# ENVIRONMENTAL PROGRAM INFORMATION

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## Introduction

The vitrified high-level radioactive waste (HLW) presently stored at the Western New York Nuclear Service Center (WNYNSC) on the West Valley Demonstration Project (WVDP or Project) premises is the by-product of the reprocessing of spent nuclear fuel during the late 1960s and early 1970s. At that time, the WNYNSC was leased by Nuclear Fuel Services, Inc. (NFS) for a commercial nuclear fuel reprocessing facility.

As the WNYNSC is no longer an active nuclear fuel reprocessing facility, the WVDP environmental monitoring program focuses on measuring radioactivity and chemicals associated with the residual by-products of the former NFS operations, the Project's former HLW treatment operations, and the Project's operations for management of HLW, transuranic waste, and low-level radioactive waste (LLW). The following information about the operations at the WVDP and about radiation and radioactivity will be useful in understanding the activities of the Project and the terms used in reporting the results of environmental test measurements.

**Radiation and Radioactivity.** Radioactivity is a characteristic of some elements that have unstable atomic nuclei, which spontaneously disintegrate or "decay" into atomic nuclei of another isotope or

element. The nuclei decay until only a stable, non-radioactive isotope remains. Depending on the isotope, this process can take anywhere from less than a second to billions of years.

As atomic nuclei decay, radiation is released in three main forms: alpha particles, beta particles, and gamma rays. By emitting energy or particles, the nucleus becomes more stable.

*Alpha Particles.* An alpha particle is a fragment of a much larger nucleus. It consists of two protons and two neutrons (similar to the nucleus of a helium atom) and is positively charged. Compared to beta particles, alpha particles are relatively large and heavy and do not travel very far when ejected by a decaying nucleus. Therefore, alpha radiation is easily stopped by a thin layer of material such as paper or skin. However, if radioactive material is ingested or inhaled, the alpha particles released inside the body can damage soft internal tissues because their energy can be absorbed by tissue cells in the immediate vicinity of the decay. An example of an alpha-emitting radionuclide is the uranium isotope with an atomic weight of 232 (uranium-232). Uranium-232 was in the HLW mixture at the WVDP as a result of a thorium-based nuclear fuel reprocessing campaign conducted by NFS. Uranium-232 has been detected in liquid waste streams.

### **Radioactivity**

*Atoms that emit radiation are called radionuclides. Radionuclides are unstable isotopes of an element that have the same number of protons but different numbers of neutrons, resulting in different atomic masses. For example, the element hydrogen has two stable isotopes, hydrogen-1 ( $H^1$ ) and hydrogen-2 ( $H^2$ ) (deuterium), and one radioactive isotope, hydrogen-3 ( $H^3$ ) (tritium). The numbers following the element's symbol identify the atomic mass, which is the number of protons plus neutrons in the nucleus. Thus,  $H^1$  has one proton and no neutrons,  $H^2$  has one proton and one neutron, and  $H^3$  has one proton and two neutrons.*

*When radioactive atoms decay by emitting radiation, the daughter products that result may be either radioactive or stable. Generally, radionuclides with high atomic numbers, such as uranium-238 and plutonium-239, have many generations of radioactive progeny. For example, the radioactive decay of plutonium-239 creates uranium-235, thorium-231, protactinium-231, and so on, through 11 progeny until only the stable isotope lead-207 remains.*

*Radionuclides with lower atomic numbers often have no more than one daughter. For example, strontium-90 has one radioactive daughter, yttrium-90, which finally decays into stable zirconium; cobalt-60 decays directly to stable nickel with no intermediate nuclide.*

*The time required for half of the radioactivity of a radionuclide to decay is referred to as the radionuclide's half-life. Each radionuclide has a unique half-life; both strontium-90 and cesium-137 have half-lives of approximately 30 years while plutonium-239 has a half-life of 24,110 years. Knowledge of radionuclide half-lives is often used to estimate past and future inventories of radioactive material. For example, a 1.0-millicurie source of cesium-137 in 2000 would have measured 2.0 millicuries in 1970 and will be 0.5 millicuries in 2030.*

*Radiation emitted by radionuclides may consist of electromagnetic rays, such as x-rays and gamma rays, or charged particles, such as alpha and beta particles. A radionuclide may emit one or more of these radiations at characteristic energies that can be used to identify them.*

### **Background Radiation**

*Background radiation is always present, and everyone is constantly exposed to low levels of such radiation from both naturally occurring and man-made sources. In the United States the average total annual exposure to low-level background radiation is estimated to be about 360 millirem (mrem) or 3.6 millisieverts (mSv). Most of this radiation, approximately 295 mrem (2.95 mSv), comes from natural sources. The rest comes from medical procedures, consumer products, and other man-made sources (National Council on Radiation Protection and Measurements Report 93, 1987). (See Figure 2-1 in Chapter 2, Environmental Radiological Program Information.)*

*Background radiation includes cosmic rays; the decay of natural elements, such as potassium, uranium, thorium, and radon; and radiation from sources such as chemical fertilizers, smoke detectors, and televisions. Actual doses vary depending on such factors as geographic location, building ventilation, and personal health and habits.*

**Beta Particles.** A beta particle is an electron emitted during the breakdown of a neutron in a radioactive nucleus. Compared to alpha particles, beta particles are smaller, have less of a charge, travel at a higher speed (close to the speed of light), and can be stopped by wood or less than an inch of aluminum. If released inside the body, beta particles do much less damage than an equal number of alpha particles because beta particles deposit energy in tissue cells over a larger volume than alpha particles. Strontium-90, a fission product found in the stabilized supernatant, is an example of a beta-emitting radionuclide.

**Gamma Rays.** Gamma rays are high-energy “packets” of electromagnetic radiation, called photons, that are emitted from the nucleus. Gamma rays are similar to x-rays but generally are more energetic. If an alpha or beta particle released by a decaying nucleus does not carry off all the energy generated by the nuclear disintegration, the excess energy may be emitted as gamma rays. If the released energy is high, a very penetrating gamma ray is produced that can be effectively reduced only by shielding consisting of several inches of a dense material, such as lead, or of water or concrete several feet thick. Although large amounts of gamma radiation are dangerous, gamma rays are also used in lifesaving medical procedures. An example of a gamma-emitting radionuclide is barium-137m, a short-lived daughter product of cesium-137. Both barium-137m and its precursor, cesium-137, are major constituents of the WVDP HLW.

**Measurement of Radioactivity.** The rate at which radiation is emitted from a disintegrating nucleus can be described by the number of decay events or nuclear transformations that occur in a radioactive material over a fixed period of time. This process of emitting energy, or radioactivity, is measured in curies (Ci) or becquerels (Bq).

The curie is based on the decay rate of the radionuclide radium-226. One gram of radium-226 decays at the rate of 37 billion nuclear disintegrations per second ( $3.7 \times 10^{10}$  d/s), so one curie equals 37 billion nuclear disintegrations per second. One becquerel equals one decay, or disintegration, per second. (See the Scientific Notation section at the back of this report or the Data Reporting section in this chapter for information on exponentiation [i.e., the use of “E” to mean the power of 10].)

Very small amounts of radioactivity are sometimes measured in picocuries. A picocurie is one-trillionth ( $1 \times 10^{-12}$ ) of a curie, equal to  $3.7 \times 10^{-12}$  d/s ( $3.7 \times 10^{-12}$  Bq), or 2.22 disintegrations per minute.

**Measurement of Dose.** The amount of energy absorbed by the receiving material is measured in rads (radiation absorbed dose). A rad is 100 ergs of radiation energy absorbed per gram of material. (An erg is the approximate amount of energy necessary to lift a mosquito one-sixteenth of an inch.) “Dose” is a means of expressing the amount of energy absorbed, taking into account the effects of different kinds of radiation.

Alpha, beta, and gamma radiation affect the body to different degrees. Each type of radiation is given a quality factor that indicates the extent of human cell damage it can cause compared with equal amounts of other ionizing radiation energy. Alpha particles cause 20 times as much damage to internal tissues as x-rays, so alpha radiation has a quality factor of 20, compared to gamma rays, x-rays, or beta particles, all of which have a quality factor of one.

The unit of dose measurement to humans is the rem (roentgen equivalent man). The number of rem are equal to the number of rads multiplied by the quality factor for each type of radiation. Dose can also be expressed in sieverts. One sievert equals 100 rem.

## Environmental Monitoring Program Overview

Human beings are exposed to radioactivity from site activities primarily through air, water, and food. At the WVDP all three pathways are monitored, but air and surface water pathways are the two primary means by which radioactive material can move off site.

Site geology (types of soil and bedrock), hydrology (location and flow of surface water and groundwater), and meteorology (wind speed, patterns, and direction) are all considered when evaluating potential exposure through the major pathways.

The on-site and off-site monitoring program at the WVDP includes measuring the concentration of alpha and beta radioactivity, conventionally referred to as “gross alpha” and “gross beta,” in air and water effluents. Measuring the total alpha and beta radioactivity from key locations produces a comprehensive picture of on-site and off-site levels of radioactivity from all sources. For a U.S. Department of Energy (DOE) site such as the WVDP, frequent updating and tracking of the overall radioactivity levels in effluents is an important tool in maintaining acceptable operations.

More-detailed measurements are also made for specific radionuclides. Strontium-90 and cesium-137 are measured because they have been previously detected in WVDP waste materials. Radiation from other important radionuclides, such as tritium or iodine-129, is not sufficiently energetic to be detected by gross measurement techniques, so these must be analyzed separately using methods with greater sensitivity. Heavy elements, such as uranium, plutonium, and americium, require special analysis because they exist in such small concentrations in the WVDP environs.

The radionuclides monitored at the Project are those that might produce relatively higher doses or that are most abundant in air and water effluents. Because man-made sources of radiation at the Project have been decaying for more than 30 years, the monitoring program does not routinely include short-lived radionuclides, that is, isotopes with a half-life of less than two years, which would be present at less than 1/1,000 of the original radioactivity levels. (See Appendix B<sup>60</sup> for the schedule of samples and radionuclides measured and Appendix K<sup>60</sup> for a listing of the half-lives of radionuclides measured in WVDP samples and related DOE protection standards, such as the derived concentration guides [DCGs]. See also the discussion of DCGs in this chapter.)

**Data Reporting.** Because the decay of radioactive atoms is a random process, an inherent uncertainty is associated with all measurements of environmental radioactivity. This can be demonstrated by repeatedly measuring the number of atoms that decay in a radioactive sample over some fixed period of time. The result of such an experiment would be a range of values for which the average value would provide the best indication of how many radioactive atoms were present in the sample.

In actual practice, an environmental sample is usually measured for radioactivity only once. The inherent uncertainty of the measurement, then, stems from the fact that it cannot be known whether the result from one measurement is higher or lower than the “true” value.

The term *confidence interval* is used to describe the range of measurement values above and below the test result within which the “true” value is expected to lie. This interval is derived statistically. The width of the interval is based primarily on a predetermined confidence level, that is, the probability that the confidence interval actually en-

### **Derived Concentration Guides**

*A derived concentration guide (DCG) is defined in DOE Order 5400.5 as the concentration of a radionuclide in air or water that, under conditions of continuous exposure by one exposure mode (i.e., ingestion of water, immersion in air, or inhalation) for one year, would result in an effective dose equivalent of 100 mrem (1 mSv) to a “reference man.” These concentrations – DCGs – are used as reference screening levels to enable WVDP personnel reviewing effluent and environmental data to decide if further investigation is needed. (See Appendix K<sup>60</sup> for a list of DCGs.)*

*For liquid effluent screening purposes, the percentages of the DCGs for all radionuclides present are summed. If the total is less than 100%, then the effluent complies with the DOE guideline. DCGs are also compared with radionuclide concentrations from these sources to verify that Best Available Technology standards for treatment of water are being met.*

*The DOE provides DCGs for airborne radionuclides in locations where members of the public could, over an extended period of time, breathe air containing contaminants. DCGs are only applicable to radionuclides in air breathed by members of the public. DCGs may be used as a comparative basis for screening concentrations from air emission points.*

*DOE Orders and federal regulations require that the hypothetical dose to the public from facility effluents be estimated using specific computer codes. (See Dose Assessment Methodology in Chapter 2, Environmental Radiological Program Information.) Doses estimated for WVDP activities are calculated using actual site data and are not related directly to summed DCG values. Dose estimates for liquid effluents are based on the product of radionuclide quantities released and the site-specific dose equivalent effects for that radionuclide. Although airborne DCGs are used for comparison purposes, the more stringent U.S. Environmental Protection Agency (EPA) National Emission Standards for Hazardous Air Pollutants regulate Project airborne effluents at the point of release. For a consistent guide to relative concentrations, both air and water sampling results are compared with DCGs throughout this report.*

compasses the “true” value. The WVDP environmental monitoring program uses a 95% confidence level for all radioactivity measurements and calculates confidence intervals accordingly.

The confidence interval around a measured value is indicated by the plus-or-minus ( $\pm$ ) value following the result (e.g.,  $5.30 \pm 3.6\text{E-}09$  microcuries per milliliter [ $\mu\text{Ci/mL}$ ]), with the exponent of  $10^{-9}$  expressed as “E-09.” Expressed in decimal form, the result  $5.30 \pm 3.6\text{E-}09$  would be  $0.0000000530 \pm 0.000000036 \mu\text{Ci/mL}$ . A sample

measurement expressed this way is correctly interpreted to mean “there is a 95% probability that the concentration of radioactivity in this sample is between  $1.7\text{E-}09 \mu\text{Ci/mL}$  and  $8.9\text{E-}09 \mu\text{Ci/mL}$ .” (See also Scientific Notation at the end of this report.) If the confidence interval for the measured value includes zero (e.g.,  $5.30 \pm 6.5\text{E-}09 \mu\text{Ci/mL}$ ), the value is considered to be below the detection limit. The values listed in tables of radioactivity measurements in the appendices include the confidence interval regardless of the detection limit value.

In general, the detection limit is the minimum amount of constituent or material of interest detected by an instrument or method that can be distinguished from background and instrument noise. Thus, the detection limit is the lowest value at which a sample result shows a statistically positive difference from a sample in which no constituent is present.

Nonradiological data are conventionally presented without an associated uncertainty and are expressed by the detection limit prefaced by a “less-than” symbol (<) if that analyte was not measurable.

Units of measure, as used in this document, are listed in the Units of Measure section in the back of this report. In the text, traditional radiological units (e.g., rem, rad, curie, roentgen) are presented first, followed by Systeme Internationale (S.I.) units. Nonradiological measurements are presented in metric units. A conversion chart for comparing traditional and S.I. radiological units and English and metric nonradiological units is presented in the Units of Measure section.

**Changes in the 2004 Environmental Monitoring Program.** Two modifications to the environmental sampling and surveillance network were made in 2004.

- A new air sampling location (ANRHWFK) at the recently constructed remote-handled waste facility (RHWF) was brought on line in May 2004 and radiological operations began at this facility in June 2004.
- Portable air samplers were used to monitor outdoor ventilated enclosures/portable ventilation units, which were used in an expanded role in 2004 to ventilate decontamination activities in the main plant.

See Appendix B<sup>60</sup> for a detailed summary of the program changes and the sample points and parameters measured in 2004.

## Completion of Vitrification

HLW from NFS operations was originally stored in two of four underground tanks (tanks 8D-2 and 8D-4). Contents in the tanks were pretreated to remove sodium salts and sulfates and most of the radioactive cesium, and resulting wastes were fixed into about 20,000 drums of cemented LLW between 1988 and 1990. Vitrification of the HLW began in 1996 and continued through September 2002. (See the 2002 WVDP Annual Site Environmental Report [West Valley Nuclear Services Company [WVNSCO] and URS, 2003] for a complete description of the vitrification process.)

Over the course of vitrification, more than 12.2 million cesium/strontium curies were transferred to the vitrification facility and 275 canisters were filled. Two additional waste canisters were generated when the melter was evacuated. Canisters are in temporary storage in a shielded cell in the main plant, the former chemical processing cell, and are being maintained until a disposal facility becomes available.

## 2004 Activities at the WVDP

The WVDP’s environmental management system (EMS) is an important factor in the environmental monitoring program and the accomplishment of its mission. Significant components, initiatives, and accomplishments at the WVDP in 2004 are summarized below.

**Decontamination and Dismantlement.** Decontamination of the head end cells (including the general purpose cell and the process mechanical cell ) and in extraction cell 2 continued and was completed in 2004 with the removal of excess

equipment. Decontamination of the vitrification cell continued and dismantlement began with removal of the jumpers and major equipment and vessels, including the melter. More than 150 waste containers of dismantled hardware were successfully removed. This work will continue in 2005.

**Sodium-Bearing Waste Management.** Sodium-bearing wastewater consisting of flushed liquid retrieved from the waste tank farm was solidified on site during 2004. A portable system was used to solidify approximately 11,500 gallons (43,500 liters) of this LLW. The solidified material was placed into 17 ten-ton steel containers for off-site transport to the Nevada Test Site (NTS).

**Rail Spur Repairs.** Reconstruction of a 750-foot-long section of the rail spur that services the WVDP was completed during 2004 to support waste shipments from the site. The work included lifting rails and ties, removing loose soil under the rail bed, installing drainage, and grading and compacting with new stone. Before removal, the rail bed soils were characterized for chemical constituents in order to identify appropriate soil management practices.

**Infrastructure Footprint Reduction.** Personnel were relocated to available on-site locations, which enabled the removal of several office and storage trailers from the WVDP site. Similar reductions of the site's infrastructure footprint will continue in 2005.

**Remote-Handled Waste Facility Construction.** As part of project operations, various contaminated materials and components were removed from the former process building and stored awaiting disposal. As work progresses toward eventual decommissioning, additional materials and components will be removed from the waste tank farm and the former process building. Before these waste materials can be shipped for

disposal, they must be characterized, sorted, processed as necessary, and packaged to meet regulatory requirements for transportation. Construction of the RHWF, where these activities take place, was completed in 2004. DOE authorized the startup of radioactive processing on June 3, 2004 and two waste processing campaigns were completed by the end of 2004.

**Environmental Management of Aqueous Radioactive Waste.** Water containing radioactive material from site process operations is collected and treated in the low-level waste treatment facility (LLWTF), which includes the LLW treatment building and associated holding lagoons. (Water from the sanitary system, which does not contain added radioactive material, is managed in a separate system.)

The treated process water is held, sampled, and analyzed before its release through a New York State Pollutant Discharge Elimination System (SPDES)-permitted outfall. In 2004, about 15.0 million gallons (56.6 million liters) of water were treated in the LLWTF system and discharged through outfall 001, the lagoon 3 weir. The total 2004 discharge waters contained an estimated 12.6 millicuries of gross alpha plus gross beta radioactivity. Comparable releases during the previous 19 years averaged about 32 millicuries per year. The 2004 release was about 40% of this average. (See "Overview of Water Effluent and Ambient Surface Water Monitoring" in Chapter 2.)

Approximately 0.083 curies of tritium were released in WVDP-controlled liquid effluents in 2004 – about 7% of the 19-year annual average of 1.12 curies.

**North Plateau Groundwater Recovery System (NPGRS).** The NPGRS operated throughout 2004, recovering groundwater from an area near the leading edge of the strontium-90 plume on the north plateau. For a more detailed discus-

sion of the plume and the NPGRS, see Chapter 2, “Northeast Swamp and North Swamp Drainage,” and Chapter 4, “Results of Routine Groundwater Monitoring” and “Special Groundwater Monitoring.”

**Environmental Management of Airborne Radioactive Emissions.** Ventilated air from the various WVDP facilities is sampled continuously during operation for particulate matter and for gaseous radioactivity. In addition to monitors that alarm if particulate matter radioactivity increases above preset levels, the sample media are analyzed in the laboratory for the specific radionuclides that are present in the radioactive materials being handled.

Air used to ventilate the facilities undergoing radioactive material cleanup is passed through filtration devices before being emitted to the atmosphere. These filtration devices are generally more effective for particulate matter than for gaseous radioactivity. For this reason, facility air emissions tend to contain a greater amount of gaseous radioactivity (e.g., tritium and iodine-129) than radioactivity associated with particulate matter (e.g., strontium-90 and cesium-137). However, gaseous radionuclide emissions still remain so far below the most restrictive regulatory limit for public safety that additional treatment technologies beyond those already provided are not necessary.

Gaseous radioactivity emissions from the main plant in 2004, the second full year since vitrification was completed, included approximately 5.57 millicuries of tritium (as hydrogen tritium oxide) and 0.028 millicuries of iodine-129. (See Chapter 2 for a discussion of iodine-129 emissions from the main plant stack.) As expected, these 2004 values are quite low in comparison to values from 1997, the first full year the vitrification system operated at a relatively high rate of production. In 1997, tritium and iodine-129 emissions were 140 millicuries and 7.43 millicuries, respectively.

Particulate matter radioactive emissions from the main plant in 2004 included approximately 0.13 millicuries of gross beta-emitting radioactivity and 0.004 millicuries of gross alpha-emitting radioactivity. In 1997, beta-emitting and alpha-emitting radioactivity emissions were 0.4 millicuries and 0.001 millicuries, respectively. Increased alpha-emitting radioactivity in main stack air effluent in 2004 was related to ongoing decontamination and decommissioning activities in the main process building.

**Environmental Management of Radiological Exposure.** Environmental radiation is measured with thermoluminescent dosimeters (TLDs) at on-site and off-site locations. (See Figs. A-10 and A-11 for the locations of on-site and off-site TLD monitoring points.) Although exposure rates at many on-site locations were elevated with respect to background, results from perimeter TLDs that would be more representative of exposure to the public were statistically indistinguishable from background results. (See “Direct Environmental Radiation Monitoring” in Chapter 2.)

**Unplanned Radiological Releases.** There were no unplanned airborne radiological releases on site or off site to the environment from the Project in 2004. In addition, there were no unplanned releases to the off-site environment of waterborne radioactivity in 2004. (See “RCRA 3008(h) Administrative Order on Consent” and “Process Sewer Integrity Evaluation” in the Environmental Compliance Summary section.)

**Nuclear Regulatory Commission (NRC)-Licensed Disposal Area (NDA) Interceptor Trench and Pretreatment System.** Radioactively-contaminated n-dodecane, in combination with tributyl phosphate (TBP), was discovered at the northern boundary of the NDA in 1983, shortly after the DOE assumed control of the WVDP. Extensive sampling and monitoring through 1989 revealed the possibility that the n-dodecane/TBP



could migrate. To contain migration of this sub-surface radioactive organic contaminant, an interceptor trench and liquid pretreatment system (LPS) were built.

As in previous years, no water containing TBP was encountered in the trench and no water was treated by the LPS in 2004. More than 404,000 gallons (1,530,000 liters) of radiologically contaminated water were collected from the interceptor trench and transferred to the LLWTF for treatment during the year. Results of surface and groundwater monitoring in the vicinity of the trench are discussed in Chapter 2 under “South Plateau Surface Water and NDA Interceptor Trench” and in Chapter 4 under “Results of Monitoring at the NDA.”

**Waste Minimization Program.** The WVDP formalized a waste minimization program in 1991 to reduce the generation of LLW, mixed waste, and hazardous waste. This program is a comprehensive and continual effort to prevent or minimize pollution, with the overall goals of reducing health and safety risks, protecting the environment, and complying with all federal and state regulations. (See also the “Waste Minimization” and “Pollution Prevention” sections in the Environmental Compliance Summary and later in this chapter.)

**Pollution Prevention Awareness Program.** The WVDP’s Pollution Prevention (P2) Awareness Program is a significant part of the Project’s waste minimization program. The goal of the program is to make all employees aware of the importance of pollution prevention both at work and at home.

A crucial component of the P2 Awareness Program at the WVDP is the Pollution Prevention Coordinators group. This group communicates, shares, and publicizes prevention, reduction, reuse, and recycling information to all departments

at the WVDP. The P2 Coordinators identify and facilitate the implementation of effective source reduction, reuse, recycling, and procurement of recycled products. The WVDP employs an incentive-based program (the Bright Ideas Program) to encourage waste stream reduction/elimination, energy savings, and affirmative procurement. This program continues to foster cost savings and avoidances resulting from waste minimization and P2 activities.

**Waste Management.** The WVDP continued its accomplishments in reducing and eliminating waste generated by site activities. Reductions in the generation of LLW, mixed waste, hazardous waste, industrial wastes, and sanitary waste, such as paper, plastic, wood, and scrap metal were targeted.

Waste minimization and recycling activities during 2004 resulted in cost savings and reduced waste generation. To accomplish this, the following items were recycled:

- paper and paper products - 115 tons (104 metric tons)
- scrap metals - 30.2 tons (27.4 metric tons)
- other materials - 18.0 tons (16.3 metric tons).

**Low-Level Radioactive Waste Shipping Program.** The WVDP initiated the LLW shipping program in 1997 to reduce the inventory of legacy and newly-generated waste stored on site. Most waste was sent to commercial disposal facilities until July 2001, when the WVDP was approved to ship LLW to the NTS, a DOE facility. During calendar year (CY) 2004, a total of 20 shipments (about 104,000 cubic feet [about 3,000 cubic meters]) were safely shipped for off-site disposal. An accelerated LLW shipping schedule is planned for 2005.

### **National Environmental Policy Act (NEPA)**

**Activities.** Under NEPA, the DOE is required to consider the overall environmental effects of its proposed actions or federal projects. The President's Council on Environmental Quality established a screening system of analyses and documentation that requires each proposed action to be categorized according to the extent of its potential environmental effect. The levels of documentation include categorical exclusions (CXs), environmental assessments (EAs), and environmental impact statements (EISs).

CXs evaluate and document actions that will not have a significant effect on the environment. EAs evaluate the extent to which the proposed action will affect the environment. If a proposed action has the potential for significant effects, an EIS is prepared that describes proposed alternatives to an action and explains the effects.

Facility maintenance, decontamination activities, and minor projects that support HLW vitrification are documented and submitted for approval as CXs, although EAs occasionally are necessary for larger-scale activities.

In December 1988, the DOE published a joint Notice of Intent (NOI) with the New York State Energy Research and Development Authority (NYSERDA) to prepare an EIS for the completion of the WVDP and closure of the facilities at the WNYNSC.

The draft EIS, which describes the potential environmental effects associated with Project completion and various site closure alternatives, was completed in 1996 and released without a preferred alternative for a six-month public review and comment period. Having met throughout 1997 and 1998 to review alternatives presented in the draft EIS, the West Valley Citizen Task Force (see inset) issued the West Valley Citizen Task Force

Final Report (July 29, 1998). This report provided recommendations and advice on the development of a preferred alternative. The Task Force continues to meet and discuss issues related to Project completion and site closure decision-making.

In 2001, the DOE formally initiated its plan to split the scope of the 1996 draft EIS into two phases – one for near-term waste management decision-making and one for final decommissioning and/or long-term stewardship decision-making. Each phase will be covered by a separate EIS.

DOE published a Federal Register (FR) NOI on March 26, 2001 (66 FR 16447) formally announcing its rescoping plan and preparation of the waste management EIS. The DOE also published an Advance NOI on November 6, 2001 (66 FR 56090) announcing its commitment to begin work, in cooperation with NYSERDA, on the Decommissioning and/or Long-Term Stewardship EIS.

#### ***West Valley Citizen Task Force***

*In addition to the public comment process required by the National Environmental Policy Act, the New York State Energy Research and Development Authority, with participation from the DOE, formed the West Valley Citizen Task Force in January 1997. The mission of the Task Force is to provide advice on the completion of the West Valley Demonstration Project and cleanup, closure, and/or long-term management of the facilities at the site. The Task Force process has helped illuminate the various interests and concerns of the community, increased the two-way flow of information between the site managers and the community, and provided an effective way for the Task Force members to establish mutually-agreed-upon recommendations for the site managers to consider in their decision-making process.*

On May 16, 2003, the DOE issued the draft Waste Management EIS (68 FR 26587) for public comment. The DOE considered public comments received and issued the final Waste Management EIS in January 2004.

Because the NRC is authorized by the WVDP Act to prescribe decommissioning criteria for the WVDP, from 1998 until early 2002 the NRC worked to develop those decommissioning criteria through a series of draft policy papers and public meetings. On February 1, 2002, the NRC issued its "Decommissioning Criteria for the West Valley Demonstration Project (M-32) at the West Valley Site; Final Policy Statement" in the Federal Register (67 FR 5003). The Final Policy Statement applies the NRC's License Termination Rule (10 Code of Federal Regulations Part 20, Subpart E) as the decommissioning criteria for the WVDP and as the decommissioning goal for the entire WNYNSC.

The DOE published an NOI on March 13, 2003 (68 FR 12044) announcing its intent to prepare, in cooperation with NYSERDA, the Decommissioning and/or Long-Term Stewardship EIS. The DOE and NYSERDA are joint lead agencies on this EIS. The EPA, the NRC, and the New York State Department of Environmental Conservation (NYSDEC) are cooperating agencies on the Decommissioning and/or Long-Term Stewardship EIS. Work on preparation of this EIS continued in 2004.

The DOE and NYSERDA continue efforts to reach agreement on a preferred alternative and agency responsibilities for decommissioning and/or long-term stewardship at the WVDP and the WNYNSC.

**Self-Assessments.** Self-assessments continued to be conducted in 2004 to review the management and effectiveness of the WVDP environ-

mental protection and monitoring programs. Results of these self-assessments are evaluated and corrective actions are tracked through to completion. Overall results of these self-assessments found that the WVDP continued to implement quality requirements and, in some cases, improve the quality of the environmental protection and monitoring program. (See the Environmental Compliance Summary and Chapter 5, Quality Assurance.)

**Occupational Safety and Environmental Training.** The safety of personnel who are involved in industrial operations under DOE cognizance is protected by standards mandated by DOE Order 440.1A, "Worker Protection Management for DOE Federal and Contractor Employees," which directs compliance with specific Occupational Safety and Health Act (OSHA) requirements. This act governs diverse occupational hazards ranging from electrical safety and protection from fire to the handling of hazardous materials. The purpose of OSHA is to maintain a safe and healthy working environment for employees.

Hazardous waste operations and emergency response regulations require that employees at treatment, storage, and disposal facilities, particularly those who may be exposed to health and safety hazards during hazardous waste operations, receive training appropriate to their job function and responsibilities. The WVDP environmental, health, and safety training matrix identifies the specific training requirements for such employees.

The WVDP provides basic 24-hour hazardous waste operations and emergency response training. (Emergency response training includes spill response measures and controlling contamination of groundwater.) The WVDP trains decontamination workers and their supervisors according to the 40-hour program for hazardous waste operations and emergency response to meet the additional

OSHA training requirements of a cleanup site. The additional training provides workers with information and techniques for decontamination operations.

Training programs also contain information on waste minimization, pollution prevention, and the WVDP environmental management program. In addition to this standard training, employees working in radiological areas receive training on subjects such as understanding radiation and radiation warning signs, dosimetry, and respiratory protection. Qualification standards for specific job functions at the site are required and maintained. Training programs have evolved into a comprehensive curriculum of knowledge and skills necessary to maintain the health and safety of employees and ensure the continued compliance of the WVDP.

Medical emergencies on site are handled by the WVDP Emergency Medical Response Team. This team consists of on-site professional medical staff and volunteer New York State-certified emergency medical technicians.

Any person working at the WVDP who has a personal photo badge receives general employee training that covers health and safety, emergency response, and environmental compliance issues. All visitors to the WVDP receive a site-specific briefing on safety and emergency procedures before being admitted to the site.

**Voluntary Protection Program STAR Status.** On May 5, 2000 the WVDP received Voluntary Protection Program (VPP) STAR status. This prestigious award was granted in recognition of the WVDP's excellent worker safety and health programs. (See also the Environmental Compliance Summary.)

The WVDP has reaffirmed its commitment to DOE's VPP and was reviewed as part of the an-

nual integrated safety management system (ISMS) review. The DOE recertified the WVDP as a DOE-VPP STAR site. At the annual VPP Participants National Conference, WVNSCO was awarded the DOE's Legacy of Stars Award, which is given to sites with an outstanding safety record over a three-year period.

In addition, the WVDP has been actively promoting VPP in the community by mentoring local businesses and providing assistance to support OSHA with VPP evaluations of other sites.

Employees of the WVDP reached 2.5 million safe work hours and two years without a lost-time work accident on November 30, 2004. In recognition of this safety record, WVNSCO employees were awarded the President's Award for Safety for the second consecutive year.

**Environmental Management System Implementation.** The Project's EMS provides the basic policy and direction for work at the WVDP through procedures that support proactive management, environmental stewardship, and the integration of appropriate technologies throughout all aspects of work at the WVDP. EMS implementation is summarized in Table ECS-1.

The WVDP EMS satisfies requirements of the new DOE Order 450.1, "Environmental Protection Program." (See the discussion of new DOE Order 450.1 in the Environmental Compliance Summary.) The EMS is also in compliance with the "Code of Environmental Management Principles" (CEMP) for federal agencies and International Organization for Standardization 14001, Environmental Management Systems: "Specification for Guidance and Use," which is being implemented worldwide. The CEMP was developed by the EPA in response to Executive Order (EO) 12856, "Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements," to

serve as the basis for responsible environmental management. (EO 12856 was revoked in April 2000 by EO 13148, “Greening the Government Through Leadership in Environmental Management.”)

Following the principles and performance objectives of the CEMP helps to ensure that a federal facility’s environmental performance is proactive, flexible, cost-effective, and sustainable. The WVDP has been renewed for membership in the EPA’s National Environmental Performance Track program for implementation of this EMS. New objectives were developed for the three-year period of 2004–2006. (See National Environmental

Performance Track inset in this chapter.) The most recent self-assessment by WVNSCO, performed in December 2004, verified that the EMS continues to be effectively implemented at the WVDP.

**Integrated Safety Management System Implementation.** A plan to integrate environmental, safety, and health (ES&H) management programs at the WVDP was developed and initiated in 1998. During this development, the EMS was identified as an integral part of the ISMS. Environmental subject matter experts participate in a sitewide work review group to review work plans, identify ES&H concerns, and specify practices that ensure work is performed safely.

Implementation of an ISMS at the WVDP, including the EMS, was verified by the DOE Ohio Field Office in November 1998. The most recent self-assessment by WVNSCO, performed in August 2004, verified that the ISMS continues to be effectively implemented at the WVDP. An annual ISMS review by the DOE occurred in November 2004. The DOE specifically evaluated the integration of EMS into the ISMS and confirmed results of the WVNSCO self-assessment.

## Performance Measures

Performance measures can be used to evaluate effectiveness, efficiency, quality, timeliness, productivity, safety, or other areas that reflect achievements related to organization or process goals, and can be used as a tool to identify the need to institute changes.

The performance measures applicable to operations conducted at the WVDP, discussed here, reflect process performance related to wastewater treatment in the LLWTF, the identification of spills and releases, the reduction in waste generation, the potential radiological dose received by the maximally exposed off-site individual (MEOSI),



*The National Environmental Performance Track is designed to recognize and encourage top environmental performers – those who go beyond compliance with regulatory requirements to attain levels of environmental performance and management that benefit people, communities, and the environment.*

*The logo identifies those facilities that qualify for Achievement Track membership. Achievement Track facilities can participate in a peer exchange network to share experience, benchmark each other’s performance, share information on successful practices and strategies, and receive recognition for their work at state and local levels. The WVDP was approved for renewed membership in this program in 2004.*

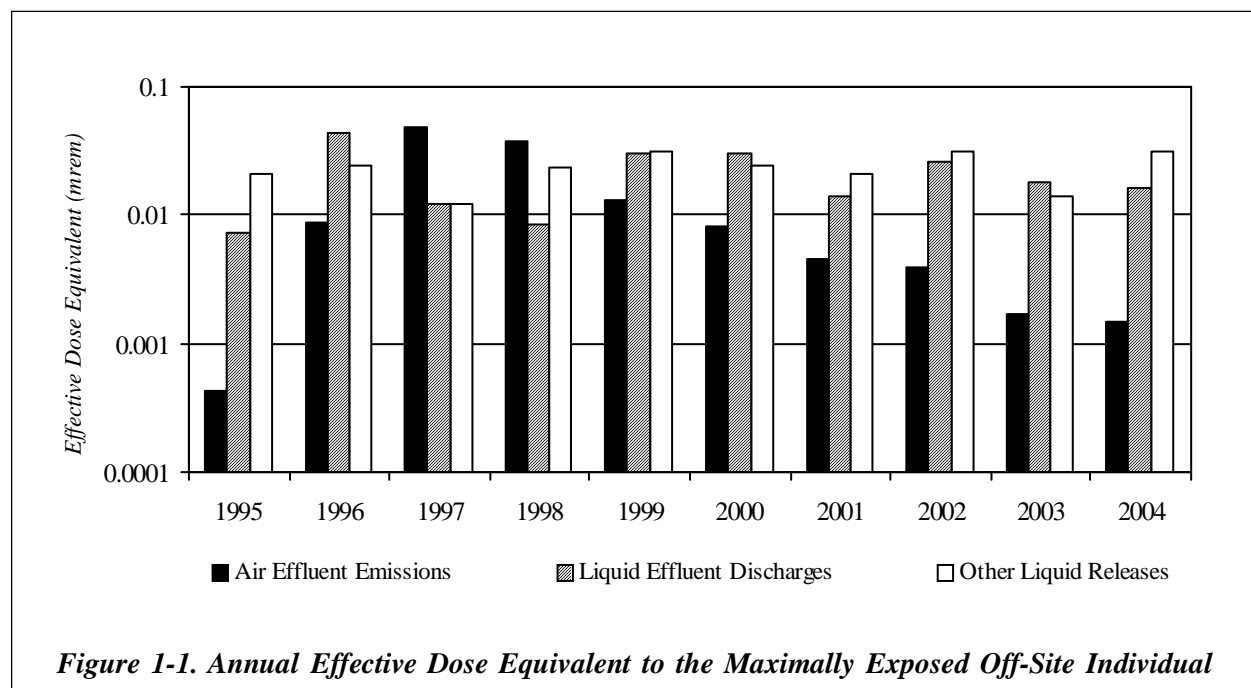
and the transfer of HLW to the vitrification system.

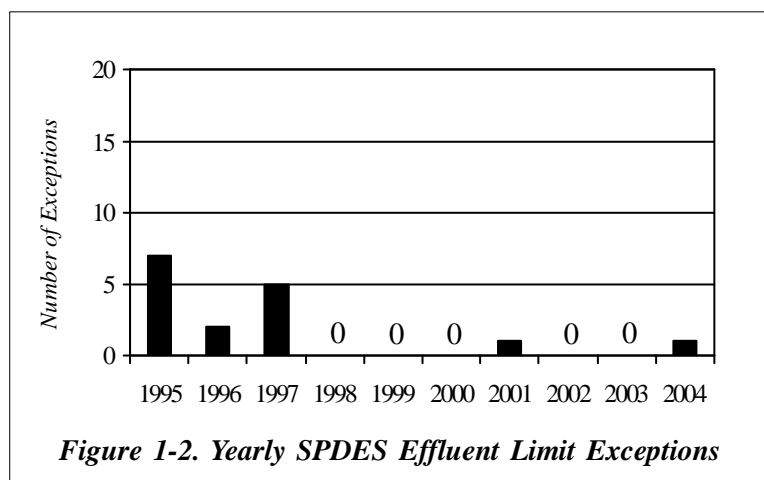
**Radiation Doses to the Maximally Exposed Off-Site Individual.** One of the most important pieces of information derived from environmental monitoring program data is the potential radiological dose to an off-site individual from on-site activities. As an overall assessment of Project activities and the effectiveness of the as-low-as-reasonably-achievable concept, the potential radiological dose to the MEOSI is an indicator of well-managed radiological operations. The effective dose equivalents for air effluent emissions, liquid effluent discharges, and other liquid releases (such as swamp drainage) from 1995 through 2004 are graphed in Figure 1-1. Note that the sum of these values is well below the DOE standard of 100 mrem per year. These consistently low results indicate that radiological activities at the site are well-controlled. (See also Table 2-3 in Chapter 2, Environmental Radiological Program Information.)

**State Pollutant Discharge Elimination System Permit Limit Exceptions.** Effective operation of the site wastewater treatment facilities is indicated by compliance with the applicable discharge permit limitations. Approximately 60 parameters are monitored regularly as part of the SPDES permit requirements. The analytical results are reported to NYSDEC via Discharge Monitoring Reports, required under the SPDES program.

Although the goal of the LLWTF and wastewater treatment facility operations is to maintain effluent water quality consistently within the permit requirements, occasionally SPDES permit limit exceptions do occur. All SPDES permit limit exceptions are evaluated to determine their cause and to identify corrective measures.

A Water Task Team, composed of WVDP personnel with expertise in wastewater engineering, treatment plant operations and process monitoring, and National Pollutant Discharge Elimination System/SPDES permitting and compliance, was





formed in 1995 to address the causes of these exceptions. The Water Task Team's efforts produced three consecutive years (1998, 1999, and 2000) with no permit limit exceptions. In 2001, one permit limit exception for total recoverable lead occurred at outfall 008 – the french drain for the LLWTF lagoon system. One SPDES limit exception occurred in May 2004 when a test result for total suspended solids (TSS) for a sample obtained at outfall 001 was reported above the allowable (daily maximum) effluent limit. (See Fig. 1-2.) The increased TSS was caused by a storm event that resulted in runoff carrying soil and sediment down the sides of the effluent-holding lagoon and into the effluent water during the discharge.

In June 2004, the minimum permit requirement for monitoring total recoverable hexavalent chromium at outfall 001 was not met. An analytical interference resulted in an inaccurate and invalid test result for one sample that was analyzed for this chemical substance. As a consequence, the number of valid sample analyses was one short of that required.

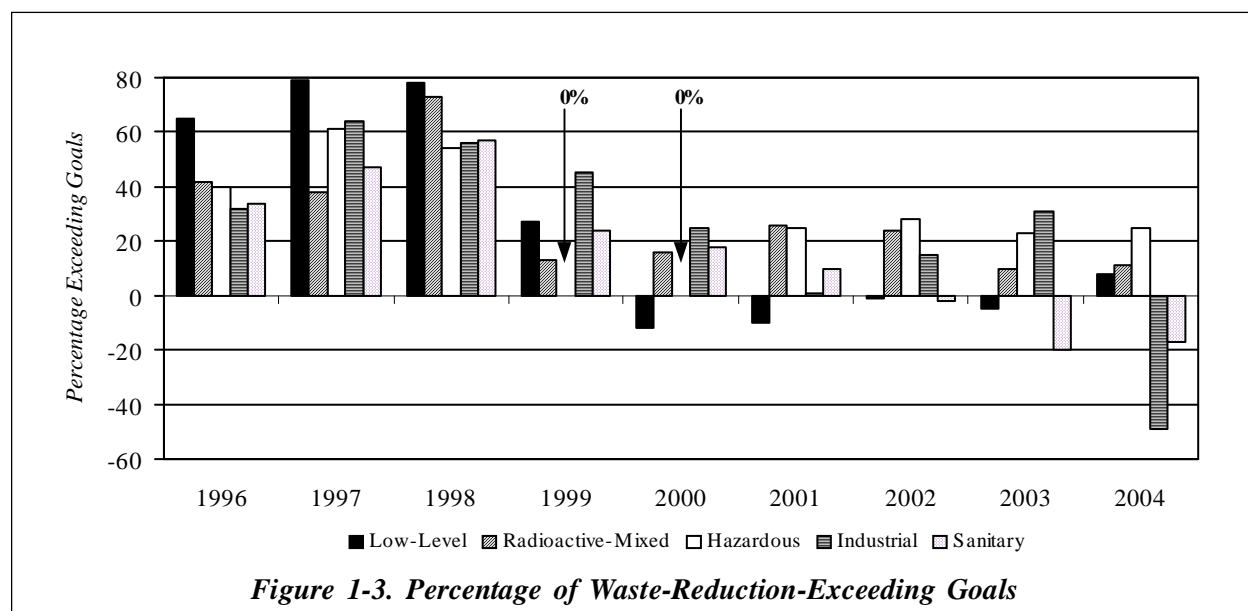
Although exceptions are not always related to operating deficiencies, corrective actions may include improved operation or treatment techniques. In 1997, the WVDP notified NYSDEC of the presence of mercury in the influent wastewater to the

LLWTF and of its likely presence at outfall 001 at concentrations below the detectable level of 0.2 micrograms per liter ( $\mu\text{g/L}$ ). In 2002, a modification to the SPDES permit required that samples being collected for measurement of mercury be analyzed in duplicate by EPA Method 245.1 (with a method detection level of 0.2  $\mu\text{g/L}$ ) and by newer, more-sensitive, EPA Method 1631E. Results of the comparison are reported to NYSDEC on a quarterly basis. Results from EPA Method 1631E in 2004 were consistent with those from EPA Method 245.1. (See Chapter 3, Mercury Analytical Method Study, for a discussion of this study.)

**Waste Minimization and Pollution Prevention.** In 2004, the WVDP continued its program of reducing and eliminating the amount of waste generated from site activities. Emphasis on good business practices, source reduction, and recycling continued to promote reduction of LLW, mixed waste, hazardous waste, industrial wastes, and sanitary wastes, such as paper, glass, plastic, wood, and scrap metal.

To demonstrate effectiveness of the waste minimization program, a graph of the percentage of waste reduction achieved above the annual goal for each category is presented in Figure 1-3 for CYs 1996 through 2004.

The WVDP set the following cumulative nonvitrication waste-reduction goals for fiscal year (FY) 2004: a 75% reduction in the generation of LLW, an 80% reduction in the generation of mixed waste, a 70% reduction in the generation of hazardous waste, a 60% reduction in the generation of industrial waste, and a 75% reduction in the generation of sanitary waste. These goals were based on quantities of routine waste generated in 1993. (As of FY 2002, all WVDP pollution prevention



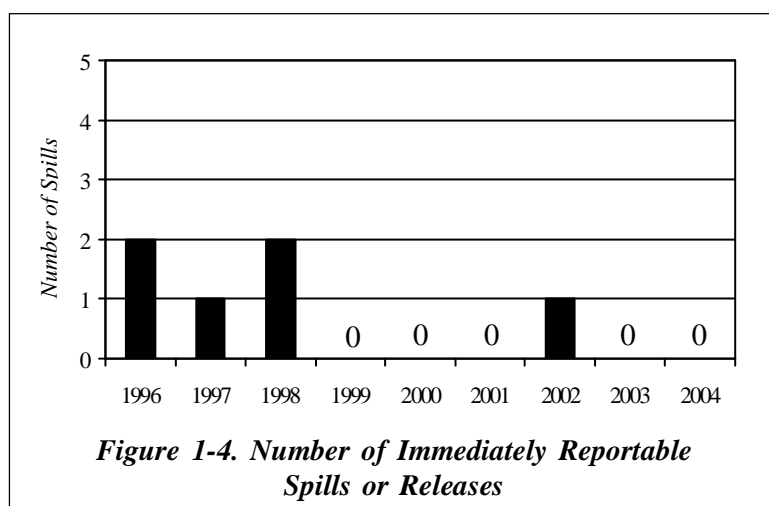
goals are in alignment with the DOE's pollution prevention goals, which are based on a federal fiscal year.)

All but two of these goals were exceeded during FY 2004. LLW generation was reduced by 83%. Mixed waste generation was reduced by 91%, hazardous waste by 95%, industrial waste by 11% (below the goal of 60%), and sanitary waste generation was reduced by 58% (below the goal of 75%). Industrial and sanitary waste generation during FY 2004 exceeded expectations due to numerous activities to support site closure milestones and efforts to improve housekeeping and eliminate unnecessary paper.

Hazardous waste and industrial waste volumes have been tracked separately for vitrification-related and nonvitrification-related waste streams since vitrification began in 1996. To maintain historical comparability, the percentages in Figure 1-3 include only the nonvitrification portions of these two waste streams.

**Spills and Releases.** Chemical spills greater than the applicable reportable quantity must be reported immediately to NYSDEC, the National Response Center, and other agencies as required. There were no reportable chemical spills during 2004.

Petroleum spills greater than five gallons – or of any amount that travel to waters of the state – must be reported immediately to the NYSDEC spill hotline and entered in the WVDP's monthly log. There were no reportable petroleum spills in





2004. Figure 1-4 is a bar graph of immediately-reportable spills from 1996 to 2004.

Prevention is the best means of protection against oil, chemical, and hazardous substance spills or releases. WVDP employees are trained in applicable standard operating procedures for equipment that they use, and best management practices have been developed that identify potential spill sources and preventive measures that will reduce the likelihood of releases. Spill training, notification, and reporting policies have also been developed to emphasize the responsibility of each employee to report spills immediately upon discovery. This first-line reporting helps to ensure that spills will be properly documented and mitigated in accordance with applicable regulations.

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